

6000 Poplar Avenue, Suite 400 Memphis, Tennessee 38119 P 901.525.1322 F 901.525.2389 www.glankler.com

> S. Joshua Kahane Direct 901.576.1701 jkahane@glankler.com

> > Licensed In:
> > Tennessee
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June 17, 2022

Via Email to beichel@bonizack.com

Benjamin J. Eichel Boni, Zack & Snyder LLC 15 St. Asaphs Road Bala Cynwyd, PA 19004

Re: 1:20-cv-06838-RMB-AMD GLOBALGEEKS, INC. v. SZN, LLC

Dear Ben:

As ordered by the Court, please allow this letter to address our client's position on the outstanding discovery issues.

- 1. We previously supplemented SZN's Response to Request No. 1 as directed by the Court.
- 2. Upon information and belief, any and all documents responsive to Request No. 10 have been previously tendered. Nothing further exists in our client's possession that is responsive to Request No. 10.
- 3. We are happy to coordinate deposition dates for any depositions that you wish to take and will provide you with the names of those individuals whom we intend to oppose so that we can efficiently schedule those depositions as well.

Should you have any additional questions or concerns, please feel free to contact me.

I remain

Very Truly Yours,

GLANKLER BROWN, PLLC

S. Joshua Kahane

cc: Client